



**DEPARTMENTS OF THE ARMY
MASSACHUSETTS ARMY NATIONAL GUARD TRAINING SITE
CAMP EDWARDS
CAMP EDWARDS, MA 02542-5003**

Commander Camp Edwards

7 May 2013

Lynne A. Jennings
U. S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OSRR07-3
Boston, MA 02109-3912

Subject: Supplemental Environmental Project 3rd Quarterly Report, Consent Order Final Agreement, Docket No. SDWA 01-2012-0021

Dear Lynne Jennings,

As outlined in the Consent Order Final Agreement (CAFO) with the MAARNG please consider this our 3rd quarterly report. The CAFO Paragraph 52, states that the "Respondent shall submit quarterly written reports outlining work completed to date and funds spent to date. The quarterly reports will include copies of invoices documenting funds spent towards completion of the SEP. The reports shall be submitted to EPA by the 30th day of the month following each quarter (January, April, July, October)."

Work commenced on this project on November 3, 2012 in compliance with the CAFO requiring work begin within 90 days of the approval (August 29, 2012) of the CAFO, making the deadline to start work 29 November 2012. The attached map, enclosure 1, indicates the areas designated as SEP impervious surface (asphalt) areas to be removed. These areas are delineated in yellow. The impervious surface removal completed to date is indicated in green.

As of 20 April 2013 approximately 251,882 square or 5.79 acres of impervious surface has been removed. This was accomplished with 1615-Man hours, 808 equipment hours, and 1615 gallons of fuel. Enclosure 2 breaks down the cost of the work effort to date. Work began again on 6 May 2013.

Two issues have come to light as the project has progressed; there is a need to have the natural gas line area "dig safe" completed through Key Span, and the potential that some amount asphalt material may need to be trucked off site.

A high pressure natural gas main passes through the SEP Area. This area was not reviewed for the larger vehicles that the MANG is using. If necessary, the area will have another dig safe review to reflect the larger vehicles the MANG is using for the project.

As a result of the potential need to truck material off site the MARNG suggest the following modification for the CAFO: Currently Section C, 2nd bullet of the CAFO states: "Respondent shall remove and stockpile reclaimed materials at the site of the proposed UTES facility within MMR." The proposed change to Section C, 2nd bullet is: "Respondent shall remove and stockpile reclaimed materials at the site of the proposed UTES facility within MMR. Respondent shall have the option of transporting any portion of such reclaimed materials off-base to a facility to be processed for reuse or recycling. Storage by Respondent of the reclaimed materials shall be in accordance with any applicable laws or regulations related to storage of the excavated asphalt material."

Material transported offsite would be transported to PA Landers off of Route 130 in Sandwich, MA. The cost to receive this material would be approximately \$3 / ton excluding fuel and labor costs. Current estimated cost for offsite transport would be approximately \$42,000.

Please let us know if you have any questions.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment.

Respectfully,

A handwritten signature in dark ink, appearing to read 'Edward P. Gallagher', is written over the typed name.

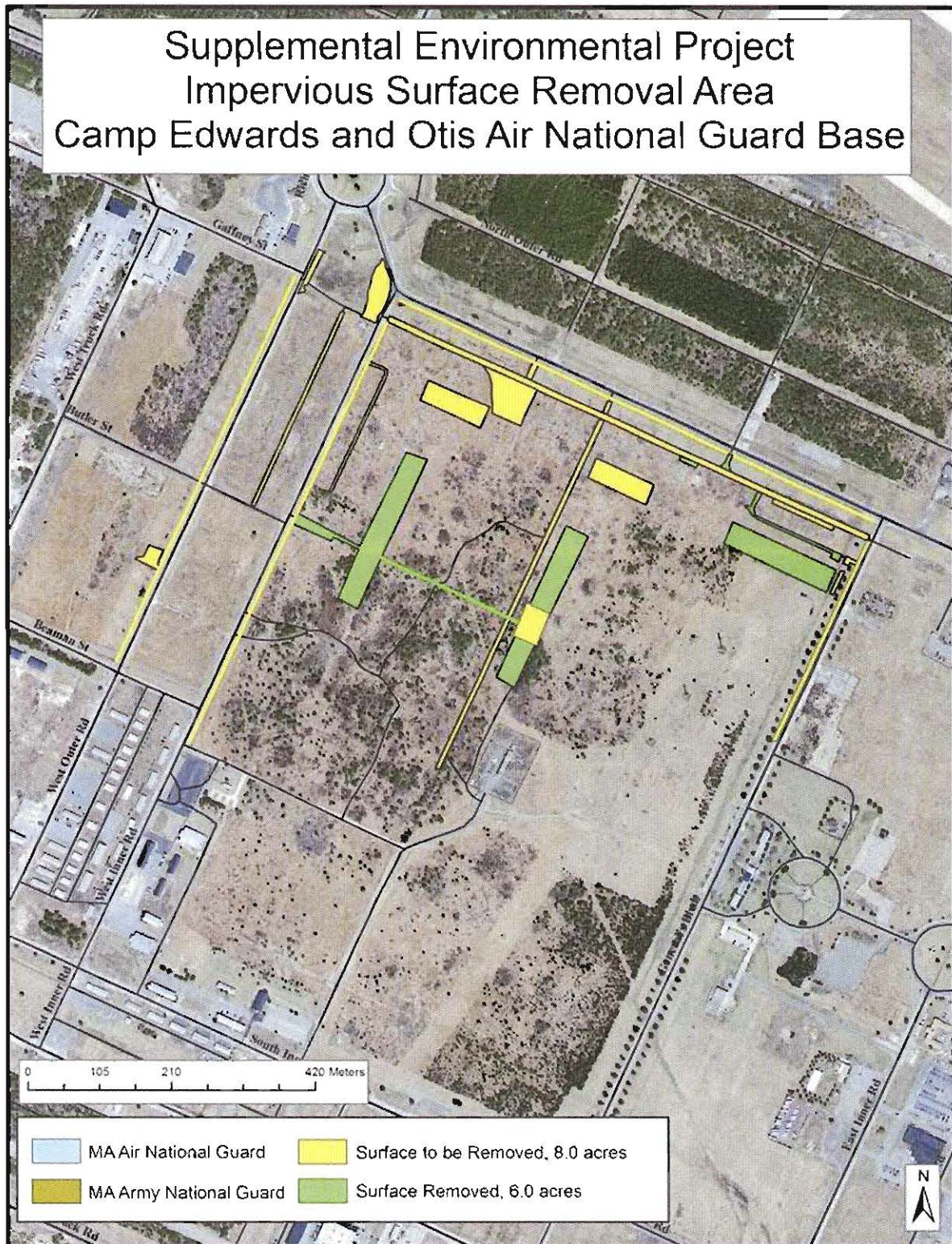
EDWARD P. GALLAGHER

MAJOR

Administrative Officer

Enclosure: (2)

Enclosure 1.



Enclosure 2.

SEP Production Report Impervious Surface Removal Project

Report Period
26 November-19 April 2013

	3-4 Nov 12	26 Nov-7 Dec 12	8-19 Apr 13	Totals to Date
MANPOWER				
Personnel	5	3	13	21
Manhours	51	240	1324.5	1615.5
Cost	\$ 1,048.43	\$ 3,613.90	\$ 14,408.77	\$ 19,071.10

EQUIPMENT				
Hours	32	210	565.1	807.1
Gallons (JP-8)	69	405.75	1140	1614.75
Cost	\$ 272.55	\$ 1,602.71	\$ 4,503.00	\$ 6,378.26

PRODUCTION				
SQ FT	10,252	68,000	173,630	251,882
ACRES	0.2354	1.561	4	5.7964
COST/Acre	\$ 5,611.64	\$ 3,341.84	\$ 4,727.94	\$ 4,560.47

TOTALS				
Production	1.68%	11.15%	28.57%	41.40%
Cost	\$ 1,320.98	\$ 5,216.61	\$ 18,911.77	\$ 25,449.36

Man Power cost is derived from Grade and Time-In-Service (TIS), hours worked on the project and Pay Status (IDT or ADOS)

Equipment Cost is based solely on Gallons of JP-8 fuel consumed.

Production is as a percentage against the 14 acre requirement